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Attorneys for Garda CL Atlantic, Inc.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

COLLAZOS,

Plaintiff,

21-cv-02095-PKC-JRC

v.

GARDA CL ATLANTIC, INC.,

Defendants.

**DECLARATION OF LOREN L. FORREST IN SUPPORT
OF DEFENDANT GARDA CL ATLANTIC, INC.'S
REVISED MOTION TO COMPEL ARBITRATION AND
STAY LITIGATION OF CLASS ACTION CLAIMS**

LOREN L. FORREST, Jr., an attorney duly admitted to practice before the courts of the State of New York, declares under penalty of perjury.

1. I am a member of Holland & Knight LLP (“H&K”), attorneys for Defendant Garda CL Atlantic, Inc. (“Garda”), in this matter. I submit this Declaration in support of Garda’s Revised Motion to Compel Arbitration and Stay Litigation of Class Action Claims.

2. Attached hereto as Exhibit 1 is a copy of a Labor Agreement, dated April 7, 2017, signed by Garda CL Atlantic, Inc. (“Garda”), and United Federation of Special Police and

Security Offices, Inc.

3. Attached hereto as Exhibit 2 is a copy of a Labor Agreement, dated September 1, 2018, signed by Garda CL Atlantic, Inc. (“Garda”), and Special and Superior Officers Benevolent Association.

4. Attached hereto as Exhibit 3 is a copy of the NLRB Case Search Results for Garda CL Atlantic, Case Number 29-RC-197242.

The foregoing is affirmed under penalty of perjury pursuant to 28 U.S.C. § 1746.

Dated: New York, New York
May 18, 2022

HOLLAND & KNIGHT LLP

By: /s/ Loren L. Forrest, Jr.
Loren L. Forrest, Jr.